

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**ROCKWELL AUTOMATION
TECHNOLOGIES, INC.,**

Plaintiff,

v.

**SECURE CROSSING RESEARCH
AND DEVELOPMENT INC.,**

Defendant.

Case No. 2:12-cv-10274-GCS-MKM

Honorable George Caram Steeh

Referred to Honorable Mona K. Majzoub

**DECLARATION OF PAUL J. TANCK, ESQ.
IN SUPPORT OF RESPONSE TO DEFENDANT'S MOTION TO
QUASH OR, IN THE ALTERNATIVE, FOR PROTECTIVE ORDER**

I, Paul J. Tanck, Esq. declare as follows:

I am a partner with the law firm Chadbourne & Parke LLP, counsel to Plaintiff Rockwell Automation Technologies, Inc. I have personal knowledge of the following facts and, if called to testify, I could and would testify competently thereto:

1. Attached as Exhibit 1 is a true and correct copy of Defendant's Response to Plaintiff's First Set of Interrogatories.
2. Attached as Exhibit 2 is a true and correct copy of a January 7, 2013 email from Paul J. Tanck to Chris Buechler's counsel, Eric Meyertons, Esq., which provided Mr. Meyertons with a copy of the Stipulated Protective Order entered in this lawsuit (Dkt. 30).
3. Attached as Exhibit 3 is a true and correct copy of a January 15, 2013 email from Paul J. Tanck to Defendant's counsel, Elana Weintraub Gloetzner, Esq.

4. Attached as Exhibit 4 is a true and correct copy of an Order Granting Rockwell Automation Technologies, Inc.'s Motion to Compel Discovery in the United States District Court for the Western District of Texas, Austin Division, dated January 29, 2013, for Case No. A13MC0054SS.

5. To date, Mr. Buechler has not served written objections to the subpoena *duces tecum* or subpoena *ad testificandum*.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 31st day of January, 2013 at New York, NY.

/s/ Paul Tanck

Paul J. Tanck

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**ATTORNEY FOR PLAINTIFF
ROCKWELL AUTOMATION TECHNOLOGIES, INC.**

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of January, 2013 a copy of the foregoing was electronically filed with the Clerk of the Court using the ECF system which will send notification of such filing to the attorneys of record.

Dated: January 31, 2013

/s/ Deborah J. Swedlow
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